

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT)
ADDICTION/PERSONAL INJURY) MDL No. 3047
PRODUCTS LIABILITY LITIGATION)
) Case No. 4:22-md-03047-YGR
)
ALL ACTIONS) **NOTICE OF PRIORITY CLAIMS**
)
) Judge Yvonne Gonzalez Rogers
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PLEASE TAKE NOTICE THAT, in accordance with Your Honor's case management directives, Plaintiffs hereby identify their priority claims for dispositive motion practice.

BACKGROUND

At two case management conferences, Your Honor instructed Plaintiffs to create a Master Complaint and to identify on the docket their five or six strongest claims for purposes of initial dispositive motion practice. Hr'g Tr. 117:10-23 (Nov. 9, 2022); *see also* CMC Hr'g Tr. 117:10-23 (Dec. 14, 2022).

PRIORITY CLAIMS

In conformity with the Court's instructions, Plaintiffs respectfully identify, in the order in which they appear in the Master Complaint, five claims:

1. Strict Liability Design [Count 1] – New York
2. Strict Liability Failure to Warn [Count 2] – New York
3. Negligent Design [Count 3] – Georgia
4. Negligent Failure to Warn [Count 4] – Georgia
5. Negligence Per Se [Count 10] – Oregon

Dated: February 14, 2023

Respectfully submitted,

1 /s/ Christopher A. Seeger
2 CHRISTOPHER A. SEEGER
3 **SEEGER WEISS, LLP**
4 55 Challenger Road, 6th Floor
5 Ridgefield Park, NJ 07660
6 Telephone: 973-639-9100
7 Facsimile: 973-679-8656
8 cseeger@seegerweiss.com

6 /s/ Previn Warren
7 PREVIN WARREN
8 **MOTLEY RICE LLC**
9 401 9th Street NW Suite 630
10 Washington DC 20004
11 T: 202-386-9610
12 pwarren@motleyrice.com

12 MICHAEL M. WEINKOWITZ
13 **LEVIN SEDRAN & BERMAN, LLP**
14 510 Walnut Street, Suite 500
15 Philadelphia, PA 19106
16 Telephone: 215-592-1500
17 mweinkowitz@lfsbalw.com

16 EMILY C. JEFFCOTT
17 **MORGAN & MORGAN**
18 220 W. Garden Street, 9th Floor
19 Pensacola, FL 32502
20 Telephone: 850-316-9100
21 ejeffcott@forthepeople.com

20 ANDRE MURA
21 **GIBBS LAW GROUP, LLP**
22 1111 Broadway, Suite 2100
23 Oakland, CA 94607
24 Telephone: 510-350-9717
25 amm@classlawgroup.com

24 MATTHEW BERGMAN
25 **SOCIAL MEDIA VICTIMS LAW**
26 **CENTER**
27 821 Second Avenue, Suite 2100
28 Seattle, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org

/s/ Lexi J. Hazam
LEXI J. HAZAM
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

Plaintiffs' Co-Lead Counsel

JOSEPH G. VANZANDT
**BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.**
234 Commerce Street
Montgomery, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 Madison Ave, 7th Floor
New York, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
T: 202-780-3014
awalsh@alexwalshlaw.com

Plaintiffs' Leadership Committee

1 RON AUSTIN
2 **RON AUSTIN LAW**
3 400 Manhattan Blvd.
4 Harvey LA, 70058
5 Telephone: (504) 227-8100
6 raustin@ronaustinlaw.com

7 JAMES J. BILSBORROW
8 **WEITZ & LUXENBERG, PC**
9 700 BROADWAY
10 NEW YORK, NY 10003
11 Telephone: 212-558-5500
12 jbilsborrow@weitzlux.com

13 CARRIE GOLDBERG
14 **C.A. GOLDBERG, PLLC**
15 16 Court St.
16 Brooklyn, NY 11241
17 T: (646) 666-8908
18 carrie@cagoldberglaw.com

19 EMMIE PAULOS
20 **LEVIN PAPANTONIO**
21 **RAFFERTY**
22 316 South Baylen Street, Suite 600
23 Pensacola, FL 32502
24 Telephone: 850-435-7107
25 epaulos@levinlaw.com

26 DIANDRA "FU" DEBROSSE
27 ZIMMERMANN
28 **DICELLO LEVITT**
505 20th St North, Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicellolevitt.com

RUTH RIZKALLA
CARLSON LAW FIRM
100 E. Central Texas Expy
Killeen, TX 76541
(254) 526-5688
RRizkalla@carlsonattorneys.com

PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
T: 210-448-0500
PBoldt@WattsGuerra.com

SIN-TING MARY LIU
**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 East Main Street, Suite 200
Pensacola, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

ROLAND TELLIS
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333
rtellis@baronbudd.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Tel: 212.213.8311
hnappi@hrsclaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 Hudson Yards, 11th Floor
New York, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

Plaintiffs' Steering Committee